

**IN RE: PATRICIA OCHOA
DONALD OCHOA**

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PA

CHAPTER 13

BANKRUPTCY NO. 20-14670-ELF

I, THEODORE B. WEISS, Attorney for the Debtors, Patricia and Donald Ochoa responds to the Trustees Motion to Dismiss as follows:

1. On, December 7, 2020, the above-referenced debtors filed a Chapter 13 bankruptcy petition in the above-referenced matter.
2. Debtors meeting of creditors hearing was successfully held and concluded on July 23, 2021.
3. Debtor's case was confirmed on November 2, 2021.
4. Debtor's plan provided for post-petition payments in the amount of \$318.70 for 51 months.
5. The debtors have attempted to comply with making post-petition payments under the plan.
6. On March 25, 2022, the Trustee filing the instant motion for failure to make plan payments.
7. Debtors have since remitted bulk of the balance of arrears to the Trustee website.
8. Counsel has advised the debtors to submit current plan payments covering the months for May 2022 on and seeks to expeditiously reinstate the Chapter 13 Plan.

WHEREFORE, based upon the foregoing, the Undersigned Counsel asks that the Trustees motion be continued or withdrawn and that debtors plan be allowed to move forward.

Dated: April 6, 2022

Respectfully submitted,

/s/Theodore B. Weiss, Esquire
Attorney for Debtor,
Patricia and Donald Ochoa